

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10068 (CTG)

(Jointly Administered)

Re: Docket Nos. 425 & 457

**CERTIFICATE OF NO OBJECTION REGARDING DEBTORS'
APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE
RETENTION AND EMPLOYMENT OF COLE SCHOTZ P.C. AS DELAWARE
CO-COUNSEL FOR THE DEBTORS EFFECTIVE AS OF THE PETITION DATE**

The undersigned proposed counsel to JOANN Inc. and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “Debtors”), hereby certifies that, as of the date hereof, no answer, objection, or other responsive pleading has been received to the *Debtors’ Application for Entry of an Order Authorizing the Retention and Employment of Cole Schotz P.C. as Delaware Co-Counsel for the Debtors Effective as of the Petition Date* [Docket No. 425] (the “Application”) that was filed under seal with the United States Bankruptcy Court for the District of Delaware (the “Court”) on February 13, 2025. Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Application (the “Proposed Order”). On February 18, 2025, the Debtors filed a redacted version of the Application [Docket No. 457]. Pursuant to the Notice of Application, objections or responses to the Application were to be filed and served on the undersigned proposed counsel by February 27,

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

2025, at 4:00 p.m. (prevailing Eastern Time) (the “Objection Deadline”). Prior to the Objection Deadline, the Debtors received informal questions regarding the Application from the U.S. Trustee. The Debtors provided informal responses to the U.S. Trustee and the parties agreed to entry of the Proposed Order. The undersigned further certifies that the Objection Deadline has passed, the Court’s docket has been reviewed in these cases, and the Debtors have not received any objections or informal comments to the Application and Proposed Order. It is hereby respectfully requested that the proposed Order attached to the Application be entered at the earliest convenience of the Court.

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Dated: February 28, 2025

Wilmington, Delaware

/s/ Patrick J. Reilley

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